

THE HONORABLE BRIAN A. TSUCHIDA

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON**

STEVE KIM, individually and on behalf of all others
similarly situated,

Plaintiff,

v.

U.S. BANCORP and U.S. BANK NATIONAL
ASSOCIATION,

Defendants.

Case No. 2:20-cv-00032-TL-BAT

**JOINT STIPULATION RE
DISCOVERY SAMPLING**

**NOTED FOR CONSIDERATION:
February 17, 2022**

1 Plaintiff Steve Kim and Defendants U.S. Bancorp and/or U.S. Bank National Association,
2 through their counsel of record, hereby submit this joint stipulation regarding discovery sampling.

3 1. On February 8, 2022, this Court issued an Order setting February 17, 2022 as the
4 deadline for the parties to submit a joint proposal regarding discovery sampling of the FLSA
5 Collective. (Dkt. No. 132.) The parties have been engaged in meet and confer efforts to agree upon a
6 joint proposal, and these meet and confer efforts are continuing in good faith. Accordingly, and to
7 allow the parties time to find a mutually agreeable proposal, the parties hereby stipulate and request
8 that the February 17, 2022 deadline set forth in the Court's February 8, 2022 Order (Dkt. No. 132)
9 be continued to March 10, 2022.

RESPECTFULLY SUBMITTED AND DATED this 17th day of February, 2022.

TERRELL MARSHALL LAW GROUP
PLLC

By: /s/ Toby J. Marshall

Toby J. Marshall, WSBA #32726
Email: tmarshall@terrellmarshall.com
Brittany J. Glass, WSBA #52095
Email: bglass@terrellmarshall.com
936 North 34th Street, Suite 300
Seattle, Washington 98103-8869
Telephone: (206) 816-6603
Facsimile: (206) 319-5450

Gregg I. Shavitz, *admitted pro hac vice*
Email: gshavitz@shavitzlaw.com
Paolo C. Meireles, *admitted pro hac vice*
Email: pmeireles@shavitzlaw.com
Logan A. Pardell, *admitted pro hac vice*
Email: lpardell@shavitzlaw.com
SHAVITZ LAW GROUP, P.A.
951 Yamato Road, Suite 285
Boca Raton, Florida 33431
Telephone: (561) 447-8888
Facsimile: (561) 447-8831

Justin M. Swartz, *admitted pro hac vice*
Email: jms@outtengolden.com
Michael N. Litrownik, *admitted pro hac vice*
Email: mlitrownik@outtengolden.com
Sabine Jean, *admitted pro hac vice*
Email: sjean@outtengolden.com
OUTTEN & GOLDEN LLP
685 Third Avenue, 25th Floor
New York, New York 10016
Telephone: (212) 245-1000
Facsimile: (646) 509-2057

Attorneys for Plaintiff

WINSTON & STRAWN LLP

By: /s/ Joan B. Tucker Fife

Joan B. Tucker Fife, *admitted pro hac vice*
Email: jfife@winston.com
WINSTON & STRAWN LLP
101 California Street, 35th Floor
San Francisco, CA 94111
Telephone: (415) 591-1000
Facsimile: (415) 591-1400

Emilie C. Woodhead, *admitted pro hac vice*
Email: ewoodhead@winston.com
Jason S. Campbell, *admitted pro hac vice*
Email: jscampbell@winston.com
Samuel Freeman, *admitted pro hac vice*
Email: sfreeman@winston.com
WINSTON & STRAWN LLP
333 S. Grand Avenue
Los Angeles, CA 90071-1543
Telephone: (213) 615-1700
Facsimile: (213) 615-1750

Julie S. Lucht, WSBA #31278
Email: jlucht@perkinscoie.com
PERKINS COIE LLP
1201 Third Avenue, Suite 4900
Seattle, WA 98101-3099
Telephone: (206) 359-3154
Facsimile: (206) 359-4154

Attorneys for Defendants

IT IS SO ORDERED, Dated this 22nd day of February, 2022.


BRIAN A. TSUCHIDA
United States Magistrate Judge

CERTIFICATE OF SERVICE

I, Joan B. Tucker Fife, hereby certify that on February 17, 2022, I electronically filed the foregoing with the clerk of the court using CM/ECF system, which will send notification of such filing to the following:

Toby J. Marshall, WSBA#327726
Email: tmarshall@terrellmarshall.com
TERRELL MARSHALL LAW GROUP PLLC
936 North 34th Street, Suite 300
Seattle, WA 98103-8869
Tel: (206) 816-6603
Fax: (206) 319-5450

Gregg I. Shavitz, *Admitted Pro Hac Vice*
Email: gshavitz@shavitzlaw.com

Paolo C. Meireles, *Admitted Pro Hac Vice*
Email: pmeireles@shavitzlaw.com

Logan A. Pardell, *Admitted Pro Hac Vice*
Email: lpardell@shavitzlaw.com

SHAVITZ LAW GROUP, P.A.
951 Yamato Road, Suite 285
Boca Raton, Florida 33431
Telephone: (561) 447-8888
Facsimile: (561) 447-8831

Justin M. Swartz, *Admitted Pro Hac Vice*
Email: jms@outtengolden.com

Michael N. Litrownik, *Admitted Pro Hac Vice*
Email: mlitrownik@outtengolden.com

Sabine Jean, *Admitted Pro Hac Vice*
Email: sjean@outtengolden.com

OUTTEN & GOLDEN LLP
685 Third Avenue, 25th Floor
New York, New York 10016
Telephone: (212) 245-1000
Facsimile: (646) 509-2057

DATED this 17th day of February, 2022.

By: /s/ Joan B. Tucker Fife
Joan B. Tucker Fife (*Admitted Pro Hac Vice*)
Email: jfife@winston.com
WINSTON & STRAWN LLP
101 California Street, 35th Floor
San Francisco, CA 94111
Telephone: (415) 591-1000
Facsimile: (415) 591-1400